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Attorneys for Defendant,  
Martha Kongsgaard individually and as Trustee of the  
Martha Kongsgaard GST Exempt Trust U/T/A  
Dated October 21, 1993

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

FRANCIS WANG, individually and as Trustee  
of WFT-TNG, a California Trust,

Plaintiff,

v.

MARTHA KONGSGAARD, individually and  
as Trustee of The Martha Kongsgaard GST  
Exempt Trust U/T/A dated October 21, 1993,

Defendant.

Case No. 3:19-cv-00907 EDL

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT  
( CIVIL LOCAL RULE 6-1(B))**

WHEREAS Francis Wang, individually and as Trustee of WFT-TNG, A California Trust (“Plaintiff”) and Martha Kongsgaard, individually and as Trustee of the Martha Kongsgaard GST Exempt Trust U/T/A dated October 21, 1983 (“Defendant”), through their counsel of record file this Stipulation for Extension of Time to Respond to Complaint and in support state as follows:

1. This action was filed on February 21, 2019, and Defendant was served on February 27, 2019;
2. On February 15, 2019, Defendant’ filed an action against Plaintiff in California State Superior Court, County of Napa, Case Number 19CV000286, entitled

Martha Kongsgaard v. Francis Wang, individually and as Trustee of the WFT-TNG Trust, et al. based on the same set of facts and real property dispute which is the subject of this action,

3. Plaintiff and Defendant have agreed to mediate this matter before Hon. W. Scott Snowden (Ret.) at a date to be determined; and
4. Neither party will be prejudiced by this extension, and it will not alter the date of any event or deadline already fixed by court order.

WHEREFORE, Plaintiff and Defendant hereby Stipulate to extend the deadline for Defendant to file her response to the Complaint in the instant action to April 23, 2019.

Dated: April 18, 2019

PHILLIPS SPALLAS & ANGSTADT LLP

By: /s/Bradley Jameson  
Bradley Jameson

Attorney for Plaintiff,  
Francis Wang

Dated: April 18, 2019

CLARK HILL LLP

By: /s/Timothy M. Flaherty

Timothy M. Flaherty  
Melissa M. Palozola

Attorneys for Defendant,  
Martha Kongsgaard individually and as Trustee of the  
Martha Kongsgaard GST Exempt Trust U/T/A  
Dated October 21, 1993